## IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,	)	
	)	CASE NO.: <u>1:19-cr-132</u>
Plaintiff,	)	
	)	JUDGE SARA LIOI
<b>v.</b>	)	
	)	MOTION FOR LEAVE TO
HARGIS HALL	)	FILE MOTION FOR
	)	COMPASSIONATE RELEASE
	)	
Defendant.	)	

Comes now the undersigned counsel and moves this Court for an ORDER, to file a motion for Compassionate Release on or before October 15, 2020.

It takes longer than 45 days to arrange telephone calls with the inmate, speaking with family and studying the case. Therefore, this counsel requests a filing date of October 15, 2020 for motion for Compassionate Release.

Respectfully submitted,

/s/Joseph W. Gardner

JOSEPH W. GARDNER #0033400

19 E Front St.

Youngstown, OH 44503

Phone: (330) 533-1118 Fax: (330) 743-6323

JWG1118@gmail.com

Attorney for Defendant

Case: 1:19-cr-00132-SL Doc #: 38 Filed: 09/02/20 2 of 2. PageID #: 277

## **CERTIFICATION**

I hereby certify that on September 2, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular US mail. Parties may access this filing through the Court's system.

JOSEPH W. GARDNER #0033400
Attorney for Defendant